

## Oversikt over Finanstilsynets ilagte overtredelsesgebyrer for brudd på flaggeplikten i verdipapirhandelloven § 4-3.

Sist oppdatert: 07.12.2021

Foretak	Saksnr.	Vedtaksdato	Flaggegrense	Gebyr (NOK)
Sundial 2000 Ltd	08/6703	22.12.2008	5%	100 000
Credit Suisse Group	08/14272	12.03.2009	5%	75 000
UBS AG	08/6274	16.03.2009	10%	100 000
Goldman Sachs International	08/12507	16.03.2009	5%	100 000
Long Term Investment Fund	08/14477	16.03.2009	5%	100 000
Taube Hodson Stonex Partners	08/13569	16.03.2009	5%	100 000
Orkla Finans Kapitalforvaltning	08/14368	20.04.2009	5%	80 000
Erik Must AS	09/01188	17.06.2009	2/3	50 000
Periscopus AS	09/01188	17.06.2009	25%	50 000
Standard Life Investments Ltd	09/01077	17.06.2009	5% x 2	150 000
Velma Marine Ltd	09/03082	01.07.2009	5% og 10%	200 000
Vollvik Invest AS	09/03103	10.08.2009	5% x 3	75 000
Barclays PLC	09/02834	25.08.2009	5% x 3	150 000
Kinderhook Partners	09/05068	10.08.2009	5%	100 000
Deutsche Bank London AG	09/10947	16.12.2009	5%	100 000
Rasmussengruppen AS	09/10216	11.01.2010	15%	200 000
Steinberg Asset Management LLC	09/13071	05.01.2010	15%	150 000
Honeychurch Assets LTD	09/07484	09.02.2010	5%	100 000
Cominvest Asset Management GmbH	09/02791	12.10.2009	5%	100 000
Grantham, Mayo, Van Otterloo & Co LLC	10/00606	09.06.2010	5% + innhold	150 000
Odin Forvaltning ASA	10/03285	02.07.2010	10% x	150 000
Capital Group International INC	09/14682	22.06.2010	5%	80 000
Nordea Bank Norge ASA	10/01003	10.08.2010	5%	150 000
Moon Capital Management LP	10/04336	24.08.2010	5%	100 000
Tufteon Oceanic Group	10/07044	15.03.2011	5%	100 000
Corem Property Group AS	10/07452	13.12.2010	5%	100 000
DNB NOR Kapitalforvaltning AS	10/07553	27.01.2011	5% + innhold	120 000
Tredje AP-Fonden AB	10/10225	24.03.2011	5%	100 000
Causeway Capital Management	11/01656	12.04.2011	5%	75 000
GCC Energy Fund LP	11/01660	04.04.2011	5%	100 000
Audley European Opportunities Fund LTD	11/02927	30.05.2011	5%	100 000

Deutsche Bank London AG	10/03814	14.10.2010	5%	200 000
NLI Eiendom AS	11/01650	14.06.2011	5% + 10%	50 000
Institusjonen Fritt Ord	11/04849	14.06.2011	5% + 10%	100 000
Cohen & Steers INC	10/011915	12.04.2011	5%	75 000
FMR LLC	11/05847	29.09.2011	5%	100 000
Terra Forvaltning AS	11/06513	31.08.2011	5%	50 000
BlackRock INC	11/07135	31.10.2011	5%	100 000
TF Holding PF	12/03996	04.06.2012	10%	100 000

Wellington Management Company LLP	12/02675	26.06.2012	10%	100 000
APG Asset Management	12/02110	14.05.2012	5%	50 000
Origo Kapital AS	12/00555	21.08.2012	5%	50 000
Pictet Funds Europe SA	12/07704	15.10.2012	5%	100 000
ING Investment Management Luxembourg SA	12/00376	14.05.2012	5%	100 000
Mandatum Life Insurance Company LTD	12/05068	10.09.2012	5%	100 000
Larsen Oil & Gas AS	12/09699	11.10.2012	5%	150 000
Water Island Capital LLC	12/00992	14.03.2012	5%	75 000
Sectoral Asset Management INC	12/12105	14.06.2013	5%	100 000
Stenshagen Invest AS	13/06563	26.09.2013	5%	75 000
Sparebankstiftelsen DNB	13/06558	17.12.2013	10%	150 000
Anko Invest AS	13/05329	04.02.2014	5%	75 000
Invent2 AS	13/11050	17.02.2014	5%	75 000
Holberg Fondsforvaltning AS	13/11049	19.03.2014	5% x 2	150 000
Brightline Asset Management LLC	14/02332	04.04.2014	5%	100 000
MP Pensjon PK	13/03283	31.03.2014	5%	100 000
JP Morgan Asset Management Holdings INC	14/01676	15.05.2014	5%	100 000
DNB Asset Management AS	14/04500	04.07.2014	5%	150 000
GLG Partners LP	14/01754	24.04.2014	5% + 10%	100 000
Køhlergruppen AS	14/04498	13.08.2014	5%	75 000
Radix AS	14/04499	06.10.2014	5%	75 000
KG Investment Comp AS	14/04496	14.10.2014	5%	100 000
Bluefield AS	11/04479	05.01.2015	5%	50 000
Brookfield Investment Management INC	14/07635	20.11.2014	5%	100 000
Invesco Asset Management Limited	14/08918	19.03.2015	5%	100 000
Nutriinvest Sverige AB	08/14472	14.12.2012	10%	100 000
Franklin Templeton Investment Management LTD	14/10617	23.04.2015	5%	100 000
APG Asset Management	14/11662	06.05.2015	5%	100 000
Prudential PLC	15/01968	29.06.2015	5%	100 000

Skagen AS	15/01539	09.07.2015	5%	100 000
Manning & Napier Advisors LLC	15/02857	14.09.2015	5%	100 000
Storebrand Asset Management AS	15/07272	15.12.2015	5%	100 000
Blue Mountain Capital Management LLC	15/06472	07.12.2015	20%	200 000
Dalton Investments LLC	15/06983	18.03.2016	10%	100 000
August Ringvold Agenturer AS	16/03896	19.08.2016	5%	100 000
Mentone AS	16/03363	22.06.2016	25%	150 000
Lansforsakringar Fondsforvaltning AB	16/03040	31.08.2016	5%	100 000
Corona Maritime Holding AS	16/01225	24.06.2016	10%	100 000
H2 Holding ApS	16/03989	17.10.2016	20%	150 000
GLG Partners LP	16/08590	07.12.2016	10%	150 000
Høylandet Byggutleie AS	16/13353	26.04.2017	5%	100 000
J O Hambro Capital Management LTD	16/13719	31.08.2017	5%	150 000
Limea Ltd.	17/02317	17.10.2017	5%	100 000
Storebrand Asset Management AS	17/09275	20.02.2018	5%	150 000
Sarella Investment Ltd.	17/07894	29.06.2018	15% + 20%	175 000
Ace Crown International Limited	17/12769	20.08.2018	10%	150 000
Kayne Anderson Rudnick Investment Management LLC	17/11166	16.07.2018	5% + 10%	150 000
Pecunia Forvaltning AS	18/09281	29.10.2018	10%	150 000
Wergeland Holding AS	18/08993	10.01.2019	5%	75 000
Egil Kristoffersen & Sønner AS	18/08993	10.01.2019	10%	75 000
Solex AS	18/09303	12.02.2019	5%	75 000
Togro Holding AS	18/09940	20.02.2019	5%	75 000
Corinvest B.V	18/08811	16.04.2019	20%	100 000
AS Flyfisk	19/13357	17.11.2020	20%	125 000
Dolphin Management AS	19/05328	17.11.2020	20%	125 000
Brian Chang Holdings Ltd	19/13079	19.11.2020	25%	150 000
Ingerø Reiten Investment Company AS	19/13212	17.11.2020	25%	150 000
Møgster Mohn Offshore AS	20/01639	28.12.2020	50%	200 000
Arctic Funds Plc	20/07561	09.03.2021	5%	100 000
Stolt-Nielsen Finance Ltd	20/02542	22.03.2021	10%	75 000
Link Fund Solutions Limited	20/01656	11.03.2021	5%	100 000
Consensus Asset Management AB (publ)	21/00976	31.05.2021	5%	100 000
Charles Schwab Investment Management Inc	21/01048	18.05.2021	5% x 2	150 000
Kayne Anderson Rudnick Investment Management LLC	21/02955	17.06.2021	10%	200 000
Donald Smith & Co. Inc.	20/14819	31.05.2021	5%	100 000
Tigerstaden AS	20/01642	25.06.2021	5%,10% + 15%	250 000
Universal Investment Gesellschaft mbH*	21/01810	28.06.2021	5%	75 000

HOLD Asset Management Ltd**	20/14036	26.05.2021	5%,10% + 15%	200 000
Alfab Holding AS	21/02958	04.10.2021	5%	75 000
Mitsui & Co. Ltd	21/02957	12.10.2021	25%	150 000
Star Spike Limited	21/02959	28.10.2021	25% x 2	300 000
Henderson Global Investors Limited	21/02796	15.11.2021	5%	100 000
Skeie Technology AS	21/04609	16.11.2021	25%	100 000
Simonsen Invest AS	21/04607	01.12.2021	5% + 10%	75 000

\* Vedtaket ble påklaget til Finansdepartementet 20. august 2021. Finansdepartementet traff vedtak 17. november 2022 om ikke å ta klagen til følge.

\*\* Vedtaket ble påklaget til Finansdepartementet 9. juni 2021. Finansdepartementet traff vedtak 11. januar 2023 om ikke å ta klagen til følge.